

MEMO ENDORSED

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October 4, 2021

VIA ECF

Honorable Kenneth M. Karas
United States District Judge – Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: **Teamsters Local 456 Pension, Health & Welfare, et al v. Sub-Tech Services, LLC, et al**
Civil Action No. 7:21-cv-02151 (KMK)
Our File No. 259-901

Dear Judge Karas:

This office represents the defendants in the above-captioned matter, Sub-Tech Services, LLC ("Sub-Tech") and Andrew Arthur ("Arthur").

Simultaneously with this letter motion we are filing opposition to Plaintiffs motion for a default judgment which is returnable before this Court tomorrow. As part of our opposition, we wish to annex an exhibit to the Declaration of our client's President, Andrew Arthur, which consists of a number of our client's New York State Employment Tax Returns (NYS-45).

The returns contain wage and income information, as well as Tax ID numbers of a number of our client's employees. We have redacted all of the wage and tax ID information, but the names of the employees and that they were not members of Teamsters Local 456 is germane to our opposition to the motion. Although wage and tax information has been redacted, we are concerned that identifying Defendant's employees in a public court filing may nonetheless be viewed as an invasion of those employees' right to privacy.

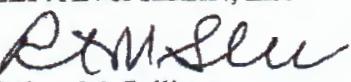
Accordingly, we would request an order of this court permitting us to file the Exhibit,

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Exhibit "B" to the Declaration of Andrew Arthur, under seal.

Respectfully submitted,

SULLIVAN & KLEIN, LLP

By: 
Robert M. Sullivan

RMS:mco

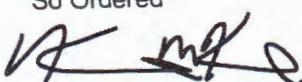
Granted.

cc:

VIA ECF

Michael S. Adler, Esq.

So Ordered


10/4/21